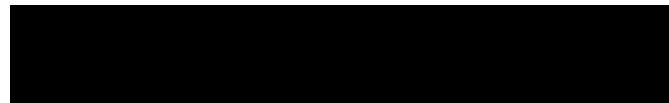


# **EXHIBIT 7 (REDACTED)**

**In the Matter Of:**

*JANE DOE vs*

*MINDGEEK USA INCORPORATED*



*July 12, 2023*

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1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA  
3 SOUTHERN DIVISION  
4

5 JANE DOE, on behalf of herself and )  
6 all others similarly situated, )  
7 Plaintiffs, ) Case No.  
8 vs. )  
9 ) 8:21-cv-00338-CJC-ADS  
10 MINDGEEK USA INCORPORATED, MINDGEEK )  
11 S.A.R.L., MG FREESITES, LTD (d/b/a )  
12 PORNHUB), MG FREESITES II, LTD, MG )  
13 CONTENT RT LIMITED and 9219-1568 )  
14 QUEBEC, INC. (d/b/a MindGeek), )  
15 Defendants. )

13 C O N F I D E N T I A L

14 - - -  
15 Wednesday, July 12, 2023  
16 - - -

16 Videotaped deposition of  
17 [REDACTED] held at the offices of  
18 Dechert, LLP, 1095 Avenue of the Americas, New  
19 York, New York 10036, before Elizabeth M.  
20 Kondor, Certified Court Reporter and Notary  
21 Public of the State of New York, on the above  
22 date, commencing at 9:03 a.m.

23

24

25 Job No. 2023-903605

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1 Q. -- do you see your e-mail beginning  
2 May 29, 2020?

3 A. Yes.

4 Q. On May 29, 2020, you e-mailed [REDACTED]  
5 [REDACTED] and wrote: "Hey, [REDACTED] please note that  
6 the following rules divided by category  
7 represent the requirements by which  
8 user-generated content on the Pornhub network is  
9 graded and judged by MindGeek content compliance  
10 and brand protection. This is based on our  
11 extensive experience dating back to almost seven  
12 years. While we don't have any of those rules  
13 written, we base our review on team experience."

14 Did I read that correctly?

15 A. You did.

16 Q. From 2013 to 2020, you did not have  
17 any rules written how to grade and judge  
18 user-generated content that might constitute  
19 CSAM, correct?

20 MS. MASSEY: Object to form.

21 A. My department didn't, but the tube's  
22 department.

23 Do you understand tubes? They did.

24 And we used their version of the  
25 rules plus our version. We have our own rules,

1 which are rules that are done for paysites, plus  
2 the experience of the team to judge and audit  
3 content after it goes live on our tubes  
4 division.

5 Q. From 2011 to 2013, the tubes division  
6 was responsible for the rules to audit the  
7 content as potential CSAM, correct?

8 MS. MASSEY: Object to form.

9 A. I don't know.

10 Q. From 2011 to 2013, the tubes  
11 department had written rules how to grade and  
12 judge user-generated content that might  
13 constitute CSAM, correct?

14 MS. MASSEY: Object to form.

15 A. Again, I don't know.

16 Q. You said prior to 2013, the tubes  
17 department was responsible for auditing content  
18 for tube websites, right?

19 A. I did not say that.

20 Q. Prior to 2013, the tubes  
21 department -- let me rephrase that question.

22 Do you mind?

23 A. Sure.

24 Q. Prior to 2013, did the tubes team  
25 have responsibility for auditing content on tube

\*\*\*

1 department.

2 Q. You referred to right now requesting  
3 additional IDs for performers in videos,  
4 correct?

5 A. Correct.

6 Q. Under what circumstances would you  
7 need to request additional IDs for performers in  
8 videos?

9 MS. MASSEY: Object to form.

10 A. There's very -- tons of scenarios.

11 Q. What's one?

12 A. We receive a content removal request  
13 saying I'm in this video and I did not consent  
14 to be in this video. We request IDs. We get a  
15 flagged video that says I know this person, and  
16 she does not want to be on Pornhub. We  
17 investigate. Somebody is reviewing content and  
18 they're not able to see the face of the girl, we  
19 could request IDs.

20 And the list goes on and on and on.

21 Q. And if someone submits a content  
22 removal request now, stating I think the girl  
23 depicted in the video is under the age of 18,  
24 you might request identification from the  
25 additional performer in the video, correct?



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333

## C E R T I F I C A T E

I, ELIZABETH M. KONDOR, a Certified Court Reporter, No. 30XI00117200, Certified LiveNote Reporter, No. 060907-14 and Notary Public of the State of New York, do hereby certify that prior to the commencement of the examination, [REDACTED] was duly sworn by me to testify the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a true and accurate transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.



Notary Public of the State of New York

My Commission expires September 19, 2026.

Dated: Thursday, July 20, 2023